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SEALED **FILED**

FEB 20 2020

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
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9 Attorneys for Plaintiff
10 United States of America

11 IN THE UNITED STATES DISTRICT COURT

12 EASTERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 CASE NO. 1:20 CR 00045 *None* SKO

15 Plaintiff,

16 v.
17 HEATHER STANLEY,

18 Defendant.

19 MOTION AND PROPOSED ORDER TO
20 SEAL INDICTMENT

21 The government moves the Court, pursuant to Rule 6(e) of the Federal Rules of
22 Criminal Procedure, to order and direct that the Indictment returned by the Grand Jury
23 on February 15, 2018, charging the above defendant with a violation of 18 U.S.C. § 1343 –
24 Wire Fraud; 18 U.S.C. § 1341 – Mail Fraud; 26 U.S.C. § 7201 – Attempt to Evade and
25 Defeat Assessment of a Tax; 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and 18 U.S.C. §
26 982(a)(1) - Criminal Forfeiture, be kept secret until the defendant named in this
27 Indictment is either in custody or has been given bail on these offenses; and further order
28 that until such time as the defendant is in custody or has been given bail, that no person

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1 shall disclose the finding of the Indictment or any warrant issued pursuant thereto, except
2 when necessary for the issuance and execution of the warrant.

3 DATED: February 20, 2020

Respectfully submitted,

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5 McGREGOR W. SCOTT
United States Attorney

6 By /s/ ANGELA L. SCOTT
7 ANGELA L. SCOTT
8 Assistant U.S. Attorney

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10 IT IS SO ORDERED.

11 Dated: February 20, 2020

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SHEILA K. OBERTO
U.S. Magistrate Judge

